

EXHIBIT B

Perez, Brianna

From: Harrison, Todd
Sent: Friday, July 19, 2024 8:30 AM
To: Yim, Josh
Cc: Perez, Brianna; Evans, Joseph
Subject: FW: Ashley Richardson Passwords and Logins for 4 trading accounts.

This is the earliest email chain I have on my system currently.

TODD HARRISON
Partner

McDermott Will & Emery LLP One Vanderbilt Avenue, New York, NY 10017-3852

Tel +1 212 547 5727 **Mobile** +1 917 797 1728 **Email** tdharrison@mwe.com

Website | [vCard](#) | [Twitter](#) | [LinkedIn](#)

From: Gravante, Nicholas <Nicholas.Gravante@cwt.com>
Sent: Saturday, July 2, 2022 5:49 PM
To: Evans, Joseph <Jbevans@mwe.com>
Cc: Avergun, Jodi <Jodi.Avergun@cwt.com>; Harrison, Todd <Tdharrison@mwe.com>; Brogan, Aaron J. <Abrogan@mwe.com>; Bradley Dizik <bdizik@guidepostsolutions.com>
Subject: Re: Ashley Richardson Passwords and Logins for 4 trading accounts.

[External Email]

Joe, sending you an email now.

Sent from my iPhone

On Jul 2, 2022, at 6:58 AM, Evans, Joseph <Jbevans@mwe.com> wrote:

Jodi,

We have a number of pressing issues.

1. The Bybit 2 login/password is invalid.
2. The Prime XBT 2 account still has 2-Factor Authentication so we are unable to access.
3. There is no good reason for Ashley to continue to withhold the Binance logins/passwords and to instead be preparing a "comprehensive transaction history document." All transactions are stored within the Binance accounts. We need access to the Binance accounts immediately.
4. Please explain what you mean when you say that she needs to travel to gain access to this "missing wallet." All wallets should have been returned months ago. We need to

know where Thomson's digital wallets are stored and if there are hardware wallets at a physical location, we can go retrieve them.

5. We don't see any representation below that these are all of the cryptocurrency exchange accounts in which Ashley was trading Taylor's cryptocurrency. We need to know immediately all of the cryptocurrency exchanges in which Ashley was trading Taylor's cryptocurrency (centralized exchanges and decentralized exchanges), all digital wallets in which she held and is currently holding Taylor's cryptocurrency, and all information needed to access those accounts and wallets.

If, as you say, your client is acting in good faith to return Taylor's assets and associated information, the above inquiries should be resolved in matter of hours, not days or weeks. Please get back to us today.

Joe

JOSEPH B. EVANS

Partner

McDermott Will & Emery LLP One Vanderbilt Avenue, New York, NY 10017-3852

Tel +1 212 547 5767 | **Mobile** +1 917 841 4738 | **Email** jbevans@mwe.com

Biography | **Website** | **vCard** | **Twitter** | **LinkedIn**

Mabel Albino, Assistant to Joseph B. Evans

Tel 212-547-5499 | **Email** malbino@mwe.com

On Jul 1, 2022, at 10:22 PM, Avergun, Jodi <Jodi.Avergun@cwt.com> wrote:

[External Email]

Bybit 1

Login: balidog@protonail.com

Password: Twigs1111!

Bybit 2

Login: cryptomoksha@protonail.com

Password: Twigs1111!

Prime XBT 2

Login: balidog@protonail.com

Password: Twigs1111!

Prime XBT 1

Login: cryptomoksha@protonail.com

Password: Twigs1111!

There is a Binance Account. I don't have the log in information for this. Ms. Richardson is working on providing a comprehensive transaction history document.

She believes she has located the missing wallet you inquired about. She has to travel to retrieve it and expects to get it by Monday or Tuesday.

Please confirm receipt of this. You can call me tomorrow if you have any issues.

-----Original Message-----

From: Harrison, Todd <Tdharrison@mwe.com>

Sent: Friday, July 1, 2022 10:04 PM

To: Avergun, Jodi <Jodi.Avergun@cwt.com>

Cc: Gravante, Nicholas <Nicholas.Gravante@cwt.com>; Evans, Joseph <Jbevans@mwe.com>; Brogan, Aaron J. <Abrogan@mwe.com>; Bradley Dizik <bdizik@guidepostsolutions.com>

Subject: Re: Ashley Richardson

I am on a plane but Joe Evans can get the account info from you. Email probably fine. Joe?

Sent from my iPhone

On Jul 1, 2022, at 9:59 PM, Avergun, Jodi <Jodi.Avergun@cwt.com> wrote:

[External Email]

Todd

Without agreeing to your narrative or the length of time it took Ms. Richardson to respond, she has given me account access information for four most trading accounts. There is one additional account for which I don't yet have information. I can go over the passwords and logs ins on the phone or send you an email. She told me she has arranged to deactivate any dual factor authentication so you can access these accounts.

How do you want to proceed.

Chair, White Collar Defense and Investigations Practice
Cadwalader, Wickersham & Taft, LLP

700 Sixth Street, N.W.
Washington, D.C., 20001

202-862-2456(o)
202-8410083 (c)

Sent from my iPhone

On Jul 1, 2022, at 8:40 PM, Harrison, Todd
<Tdharrison@mwe.com> wrote:

Jodi - I never refuse a professional courtesy when it is within my control and it makes sense. Here it is not within my control, and it doesn't make sense. My client has been waiting for six months and understandably won't let me wait another month. It also doesn't make sense where, as here, it would be simple for your client to turn over the account information and she still hasn't done so. I can't just take her word for it that she isn't accessing the assets - and if that were true it would be a simple matter for her to show us that was the case. The fact that she hasn't speaks volumes. We are still willing to try to work with you and we would certainly appreciate it if your client would do the right thing and give us the information, but I can't restrict our potential to act with any promises.

Best, Todd

Sent from my iPhone

On Jul 1, 2022, at 7:31 PM,
Avergun, Jodi
<Jodi.Avergun@cwt.com> wrote:

[External Email]

Todd this is a professional courtesy to me and Nick as we were retained a day ago.
She's not touching any assets.

Chair, White Collar Defense and Investigations
Practice

Cadwalader, Wickersham & Taft, LLP

700 Sixth Street, N.W.

Washington, D.C., 20001

202-862-2456(o)

202-8410083 (c)

Sent from my iPhone

On Jul 1, 2022, at 6:32 PM,
Harrison, Todd
<Tdharrison@mwe.com> wrote:

I definitely can't make that representation, and I can't imagine how it would be in my client's interests. Your client has been stalling for six months, it's time for her to cooperate and do the right thing and give my client her property back, and all related information. If she doesn't at least start giving it back, we will have no choice but to take action, especially where, as here, the assets are cryptocurrencies. It should be easy for your client to start giving us the relevant information, as we discussed. If she starts doing that, we will continue to evaluate as we go. But we can't limit or bind ourselves with any promises or representations at this point. Todd

Sent from my iPhone

On Jul
1,
2022,
at 5:04
PM,
Avergu
n, Jodi

<[Jodi.](mailto:Jodi.Avergun@cw.com)

[Avergu](mailto:Jodi.Avergun@cw.com)

[n@cw](mailto:Jodi.Avergun@cw.com)

[t.com](mailto:Jodi.Avergun@cw.com)

>

wrote:

[Some people who received this message don't often get email from jodi.avergun@cw.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[External Email]

Understood

Todd. you've made that clear.

Assuming she sends it over in next couple of hours to me, I would like your representation, before I send the information to you that, as a professional courtesy to me and Nick, we can preserve the status quo until we have our meeting — which I propose we schedule for a day between Monday - Wednesday July 25-27. This might be in Ms. Thompson's interests as well.

Chair, White Collar
Defense and
Investigations
Practice

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700 Sixth Street,
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